UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

AL MALIK ALSHAHHI, et al.

Defendants.

Case No.: 1:21-cr-00371-BMC-TAM

REPLY DECLARATION OF JAMES A. BOWMAN IN SUPPORT OF DEFENDANT THOMAS J. BARRACK, JR.'S MOTION TO DISMISS THE INDICTMENT

I, James A. Bowman, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

- 1. I am an attorney licensed to practice law in California and appearing in the above-entitled action *pro hac vice*. I am a partner with the law firm O'Melveny & Myers LLP, attorney for defendant Thomas J. Barrack, Jr. in this matter. I respectfully submit this further declaration in support of Mr. Barrack's motion to dismiss the indictment.
- 2. Attached as Exhibit 1 is a true and correct copy of a March 1, 2022 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 14, 2022 Santa Barbara, CA Respectfully submitted,

O'MELVENY & MYERS LLP

James A. Bowman (admitted *pro hac vice*)

400 South Hope Street, 18th Floor Los Angeles, CA 90071

Telephone: (213) 430-6000 Facsimile: (213) 430-6407 E-mail: jbowman@omm.com

Attorney for Thomas Joseph Barrack, Jr.